

Exhibit E

From: Christopher Boffoli studio@bigappetites.net
Subject: Re: [Flickr] Notice of Copyright Infringement
Date: October 8, 2024 at 10:15 AM
To: Flickr Trust and Safety dmca@flickr.com

No one was asking you for legal guidance. What I was asking for was for Flickr to stop playing pedantic games designed to thwart copyright complaints, to stop making up your own rules that are not required by the DMCA, and to stop protecting willful infringements on your servers. I don't need your recommendation about contacting a lawyer. I WILL take this matter to my legal team. A tickler for this item will be added to my calendar for later this month. If I check back and these infringements are still live we WILL seek a remedy from a federal court as your arrogance and inaction has provided no other option.

I might note that the breadth of images currently published to Flickr servers, without permission or license, are registered under multiple US copyright registrations. So we will seek the maximum statutory damages permitted by law.

We'll see you in court.

Christopher Boffoli
Big Appetites Studio
Seattle, Washington, USA

On Oct 8, 2024, at 10:06 AM, Olivia (Flickr Trust and Safety) <dmca@flickr.com> wrote:

Olivia (Flickr)

Oct 8, 2024, 10:06AM PDT

Hello,

We cannot address legal concerns or provide legal guidance. We will not be able to acknowledge any additional correspondence regarding this matter.

We recommend you consult a lawyer for legal advice or clarification. Legal matters can be addressed directly to:

Flickr, Inc.
Attention: Legal Department
548 Market St. PMB 32047
San Francisco, California 94104-5401 USA

If you obtain an appropriate legal process, you may provide it here for our review.

Sincerely,
Olivia

Trust and Safety

Christopher Boffoli

Oct 7, 2024, 8:08AM PDT

This is NOT required by the DMCA. I know from more than a decade of filing DMCA takedown requests. And in fact, I have many takedown requests sent to Flickr in the same manner that have been processed successfully. You cannot make up your own arbitrary rules to thwart copyright holders. So you will either process the DMCA takedown as it has been submitted or your attorneys will have to tell a federal judge with a straight face why you were incapable of complying with your obligation under the law.

Christopher Boffoli
Big Appetites Studio
Seattle, Washington, USA

Olivia (Flickr)

Oct 7, 2024, 8:01AM PDT

Hi there,

Please respond with your name in this format /Christopher Boffoli/ so we can process your request.

This format is intended to represent a signature and typed name as is customarily found within the signature block of business correspondence transmitted in hard copy.

As this is a legal document, we are unable to process your request without it.

I'll keep an eye out for your reply.

Sincerely,
Olivia
Trust and Safety

Christopher Boffoli

Oct 4, 2024, 7:17AM PDT

My signature is in the form of my name at the bottom of the e-mail. This satisfies the requirement under the DMCA. If Flickr refuses to process this complete and valid DMCA takedown notice then you will lose your safe harbor protection and this notice will be forwarded to my legal team with a request to file against Flickr for statutory damages. Stop playing games and comply with your obligation under the law.

Christopher Boffoli
Big Appetites Studio
Seattle, Washington, USA

Olivia (Flickr)

Oct 4, 2024, 6:28AM PDT

Hello,

Thank you for contacting Flickr. We'd be happy to assist you in this matter as quickly as possible.

Although Flickr provides users with the ability to upload, share and discuss their photos, we take the rights of intellectual property owners very seriously and comply as a service provider with all applicable provisions of the Digital Millennium Copyright Act ("DMCA").

Please review our DMCA takedown guidelines here:

[Copyright and Intellectual Property Policy](#)

The copyright infringement report you've submitted is missing the following information:

- A physical or electronic signature of the owner of the copyright that has been allegedly infringed or of a person authorized to act on behalf of the owner.

To satisfy the signature requirement, please designate the electronic signature by typing a forward slash before and after your name (e.g., /Jane Doe/). This format is intended to

represent a signature and typed name as is customarily found within the signature block of business correspondence transmitted in hard copy.

The information asked for in our guidelines is required in order for us to legally remove an infringing document. If you wish to report content posted on Flickr for copyright infringement, please reply with the requested information at your earliest convenience.

Please let us know if you have any questions.

Sincerely,
Olivia
Trust and Safety

Christopher Boffoli

Oct 3, 2024, 6:00PM PDT

Hello. I am the author and copyright holder of a series of images called Big Appetites. My work is not in the public domain. My images are registered with the US copyright office under the following registrations: VAu1106484, VAu001148370, VAu 1-198-948, VAu 1-462-064, VA 2-064-521, VAu-1-359-319, VAu1-412-949, VA 2-262-159, VA 2-264-295, VAu 1-452-529, VA0001948517, VAu 1-489-794, VAu 1-490-001, VAu 1-490-002, PA 2-414-026.

Samples of the work can be seen online here: <http://bigappetites.net>

The following links are willful infringement in which my copyrighted work has been posted to Flickr without permission, license or attribution. As this constitutes contributory infringement for your company, I would ask that you please comply with your obligation under the DMCA remove the following infringing links in a timely manner:

<https://www.flickr.com/photos/tawfiqjuhaish/6944655131/>
<https://www.flickr.com/photos/tawfiqjuhaish/6944655599>
<https://www.flickr.com/photos/tawfiqjuhaish/6798542264>
<https://www.flickr.com/photos/tawfiqjuhaish/6798542098>
<https://www.flickr.com/photos/tawfiqjuhaish/6944654857>
<https://www.flickr.com/photos/tawfiqjuhaish/6798541560>
<https://www.flickr.com/photos/tawfiqjuhaish/6798541358>
<https://www.flickr.com/photos/tawfiqjuhaish/6798541094>
<https://www.flickr.com/photos/tawfiqjuhaish/6944654095>
<https://www.flickr.com/photos/tawfiqjuhaish/6798540742>
<https://www.flickr.com/photos/tawfiqjuhaish/6944653749>
<https://www.flickr.com/photos/tawfiqjuhaish/6798540402>
<https://www.flickr.com/photos/tawfiqjuhaish/6798540246>
<https://www.flickr.com/photos/tawfiqjuhaish/6944656373>

<https://www.flickr.com/photos/tawfiqjuhaish/6798542648>
<https://www.flickr.com/photos/tawfiqjuhaish/6798542806>
<https://www.flickr.com/photos/tawfiqjuhaish/6798542992>

I have a good faith belief that the reported use described above, in the manner I have complained of, is not authorized by the intellectual property rights owner (myself), my agents, or the law; that the information contained in this notice is accurate; and, under penalty of perjury, that I am authorized to act on behalf of the owner of the intellectual property rights at issue.

Christopher Boffoli

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